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To: "William Gibbons (wgibbons)" <wgibbons@memphis.edu>
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Subject: Operation Safe Community Plan

General Gibbons,

Thanks for taking time to talk to me this week. I really appreciate your advice and helping me understand everyone's concerns and it has helped me in providing advice to the Mayor.

I read the plan and it well thought out and comprehensive. I did read the data driven policing section and am in total agreement with it. While I don't think the following observation should be in the plan, but should be considered in implementation. I think data-driven proactive policing is the one of the best strategy's and clearly a national best practice. Where departments are having legal issues is in the implementation of this. There have been a number of court decisions, studies, and class-action settlements because of faulty implementation because the program is based only on reported crime. Most cases and studies have found that the departments did not use all the data they had available and thus enforcement deployments were the result of implicit bias. Almost every department never analyzed their seizures for contraband and weapons to determine which groups were more likely to be in possession of these items. When experts analyzed the results in every case it found that the departments focused their efforts on neighborhoods of color, when in fact the departments had a higher seizure rate for different areas of town. I think this is why when New York had to modify its proactive policing practices that the crime rate did not go up, because they had additional relevant data that they never considered before. Obviously, this is a charged issue, but I would suggest that when teaming up with the MPD and assisting in the use of the data that Operation Safe Community encourage this data also be included in the data used for making deployment decisions.

Also, most court decisions examining the practices in data driven policing have noted that they do not have any quality controls in place for the officer's actions. They do not track conviction numbers to see if the officers are making legal arrests and stops. Additionally, these departments simply started making the number of stops made by an officer a performance measure. So in their evaluations management only looked at the number of the stops, not the quality of the stops. This also filtered down to front line supervisors that their performance was evaluated simply on the number of stops, not if the officers were doing professional and legal stops. These departments ended up having terrible community relations problems which resulted in DOJ and class-action lawsuits. Part of my goal is to assist the city in implementing these quality control measures so they don't have the legal issues and are still able to make enforcement decisions that can help lower the crime rate.

I am on my soap box again, so I will stop with this.

Thanks again, and please feel free to call on me if you or the commission need anything.

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